

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DEBBIE ANN BROMFIELD-THOMPSON,

Plaintiff,

v.

AMERICAN UNIVERSITY OF ANTIGUA/  
MANIPAL EDUCATION AMERICAS, LLC,  
aka GCLR, LLC et al.,

Defendant.

No. 19-CV-06078 (JMF)

**NOTICE OF MOTION TO DISMISS FIRST AMENDED COMPLAINT  
BY THE NATIONAL BOARD OF MEDICAL EXAMINERS**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of the Motion to Dismiss the Complaint by National Board of Medical Examiners, dated February 4, 2020, the proposed order, and all prior pleadings, submissions, and proceedings herein, Defendant National Board of Medical Examiners will move this Court before the Honorable Jesse M. Furman, United States District Judge, at the United States District Court for the Southern District of New York, located at 40 Foley Square, New York, New York 10007, for the entry of an order dismissing Plaintiff Debbie Ann Bromfield-Thompson's First Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(1), 12(b)(2), and 12(b)(6).

Dated: February 4, 2020

Respectfully submitted,

/s/ Evelyn Y. Pang

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